

# CLARA CITY TELEPHONE CO.

PHONE 320/847-2211 • FAX 320/847-2736  
227 SOUTH MAIN STREET  
P.O. BOX 800 • CLARA CITY, MINNESOTA 56222-0800



**Date: February 29, 2008**

**Marlene H. Dortch**  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

Received & Inspected

MAR - 3 2008

FCC Mail Room

**Re: EB Docket No. 06-36, Certification of CPNI Filing - Calendar Year 2007**

Dear Ms. Dortch:

This letter serves as the below-named Company's "Certification of CPNI Filing for Calendar Year 2007", as ordered in EB Docket No. 06-36.

**Company Name:** Clara City Telephone Company

**Address:** 227 South Main Street  
Clara City MN 56222-0800

**Form 499 Filer ID:** 815917

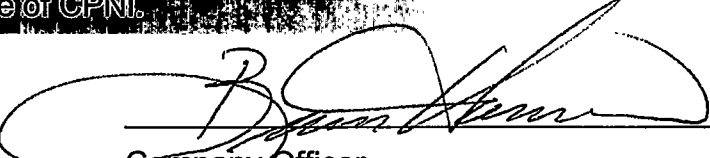
**Name and Title of Signatory:** Bruce Hanson, Treasurer

I, Bruce Hanson, certify that I am the Treasurer of the Company named above, and that, based on my personal knowledge and acting as an agent for the Company, the Company has established operating procedures that are adequate to ensure compliance with the rules established by the Federal Communications Commission ("FCC") concerning Customer Proprietary Network Information ("CPNI"), as set forth in Part 64, Subpart U, of the FCC's Rules and Regulations, 47 C.F.R. § 64.2001 *et seq.*, as revised.

The attached Statement demonstrates such compliance.

The Company had not taken any action (proceedings instituted or petitions filed by the Company at state commissions, the court system, or the FCC) against data brokers in the past year.

The Company has not received any customer complaints in the past year concerning unauthorized release of CPNI.

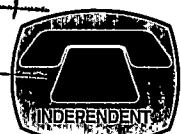
  
\_\_\_\_\_  
Company Officer

February 29, 2008  
Attachment - Statement of Compliance

No. of Copies rec'd 044  
List ABCDE



SERVING CLARA CITY, MAYNARD AND GLUEK SINCE 1903



## **STATEMENT OF COMPLIANCE**

The operating procedures of Clara City Telephone Company ensure compliance with the FCC's CPNI Rules. Such procedures are as follows:

### ***Use of CPNI in Marketing***

Our company does not use CPNI in any of its marketing efforts, and does not permit the use of, or access to, customer CPNI by our affiliates or any third parties. We use, disclose or permit access to CPNI only for the purposes permitted under 47 U.S.C. Sections 222(c)(1) and (d).

Our company has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. Each customer's record contains a designation identifying whether or not we have obtained, through the processes permitted by the FCC's rules, the customer's approval to use, disclose or permit access to his or her CPNI.

### ***CPNI Safeguards***

Our company has designated a compliance officer to maintain and secure the company's CPNI records and to supervise training of all company employees.

Our company trains its personnel as to when they are, and are not, authorized to use or disclose CPNI, and we have an express disciplinary process in place if the rules are violated.

Our company authenticates the identity of a customer prior to disclosing CPNI based on a customer-initiated telephone contact, online account access, or in-store visit.

Our company discloses call detail information (CDI) in a customer-initiated call only: after the customer provides a pre-established password; or, at the customer's request, by sending the CDI to the customer's address of record; or by calling back the customer at his or her telephone number of record.

Our company discloses CPNI to a customer in person at our retail location(s) only when the customer presents a valid photo ID and the ID matches the name on the account.

Our company establishes passwords with customers in order to authenticate customers. Neither passwords nor the backup method for authentication rely on customers' readily available biographical information.

Our company has established password protection for customers' online accounts.

Our company includes terms specifying the confidentiality and use of CPNI in its contracts with business customers that are served by a dedicated account representative.

*Our company notifies a customer immediately of changes in: a customer's password, a customer's response to back-up means of authentication, online account, or address of record.*

### ***CPNI Recordkeeping and Reporting***

Our company maintains records of our compliance with the FCC's CPNI Rules for use of CPNI in outbound marketing efforts, for at least one year.

Our company is prepared to provide the FCC with written notice, within five business days of any instance where the "opt out" mechanisms do not work properly.

Our company is prepared to notify the U.S. Secret Service and FBI within seven business days after the occurrence of an intentional, unauthorized (or exceeding authorization), access to, use of, or disclosure of CPNI. We may also notify the customer of such breach, after consulting with the investigatory agency(ies), if we believe there is an extraordinarily urgent need to notify a customer (or class of customers) in order to avoid immediate or irreparable harm. We will notify the customer of the breach after 7 business days following notification to the FBI and Secret Service, if such agencies have not requested that we postpone disclosure to the customer.

Our company will maintain records of any discovered breaches, notices to the Secret Service and FBI, and their responses, for at least two years.